

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: Simmons, James	:	CHAPTER 13
Simmons, Keisha	:	
	:	CASE NO. 19-01991-RNO

**MOTION FOR MODIFICATION OF CHAPTER 13 PLAN AFTER CONFIRMATION**

AND NOW comes the Debtors, James Simmons and Keisha Simmons (heretofore referred to as the “Debtors”), by and through their Attorney, Patrick J. Best, Esquire, of ARM Lawyers, respectfully moves this Honorable Court as follows:

1. On May 8, 2019 the Debtors filed an original Chapter 13 Plan with this Honorable Court.

2. On October 7, 2019 the Debtors filed a First Amended Chapter 13 Plan with this Honorable Court.

3. On November 26, 2019, this Honorable Court entered an Order Confirming the Debtors’ First Amended Chapter 13 Plan.

4. The Debtors intend on filing a Second Amended Chapter 13 Plan as a result of the following events:

- a. The Debtors’ sale plan has been impacted by COVID-19 as they have not been able to properly market the property or find a new place to live. Debtors now wish to try to pay their mortgage.
- b. In addition, the Debtors have had their income impacted by the COVID-19 virus and related quarantine. They believe their income should be sufficient to support the Chapter 13 plan payments by September 2020.

5. In accordance with F.R.B.P 3015(g) this Honorable Court requires the filing of a Motion to Modify or Amend the Chapter 13 Plan in order to confirm the Second Amended Chapter 13 Plan with the Court.

**WHEREFORE**, Debtor respectfully requests that this Honorable Court enter and Order confirming the Debtors' Second Amended Chapter 13 Plan.

Date: September 15, 2020

/s/ Patrick J. Best  
Patrick J. Best, Esquire  
ARM Lawyers  
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Attorney for Debtor